



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of

Atty. Docket

MAURICE J. CUIJPERS

PHN 16,580

Serial No. 09/179,290

Group Art Unit: 2621

Filed: October 27, 1998

Examiner: A. ALAVI

Title: COMPRESSING AND DECOMPRESSING AN IMAGE

Commissioner for Patents  
Washington, D.C. 20231

Sir:

In response to the Office Action dated June 20, 2001, the Appellant respectfully requests reinstatement of the Appeal. In order to support this request, enclosed is an original plus two copies of a Supplemental Brief in the above-identified patent application.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Account No. 14-1270.

Respectfully submitted,

By

*Russell Gross*  
Russell Gross, Reg. 40,007  
Attorney  
(914) 333-9631

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited this date with the United States Postal Service as first-class mail in an envelope addressed to:

**COMMISSIONER OF PATENTS AND TRADEMARKS**  
Washington, D.C. 20231

On

By

*Edna Chapp*  
F:\WPDOCS\GR\pk06gra.ecr.doc

2721

#15  
9-14-01

RECEIVED  
SEP 12 2001  
Technology Center 2600



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE BOARD OF PATENT APPEALS AND INTERFERENCES

In re Application of:

Atty. Docket

MAURICE J. CUIJPERS

PHN 16,580

Serial No. 09/179,290

Group Art Unit: 2621

Filed: October 27, 1998

Examiner: A. ALAVI

Title: COMPRESSING AND DECOMPRESSING AN IMAGE

Commissioner for Patents, Washington, D.C. 20231

RECEIVED  
SEP 12 2001  
Technology Center 2600

SUPPLEMENTAL APPEAL BRIEF

Sir:

In order to supplement the Appeal Brief mailed April 3, 2001,  
please consider the following:

A R G U M E N T S

Claims 1-12 stand rejected under 35 USC 103 as being  
unpatentable over Matsumoto et al. (U.S. Patent No. 5,606,632) in  
view of Van Aken et al. (U.S. Patent No. 4,825,390)

In order to make a proper obvious rejection under 35 U.S.C.  
103, MPEP Section 706.02(j) requires that the prior art reference  
(or references when combined) must teach or suggest all of the  
claim limitations. Further, either the references must expressly  
or impliedly suggest the claimed invention. Ex parte Clap, 227  
USPQ 972, 973 (Bd. Pat. App. & Inter. 1985)

In view of the above, it is respectfully submitted that the  
combination of Matsumoto et al. in view of Van Aken et al. neither  
expressly nor impliedly suggest all of the features recited in the

claims. In particular, such features include "grouping the image locations in each region into groups according to a similarity of color values in a source image", as recited in the claims.

In addressing the above feature in the present rejection, column 3, lines 53-57, of Van Aken et al. is being relied on. However, in column 3, lines 53-57, Van Aken et al. only discloses that each address location within pixel map memory 120 includes data corresponding to an individual pixel or pixels of a visual image to be displayed.

Based on the above disclosure, it is evident that Van Aken et al. does not disclose "grouping the image locations in each region into groups according to a similarity of color values in a source image", as required by the claims. Therefore, it is respectfully submitted that this feature is distinguishable over Matsumoto et al. in view of Van Aken et al.

Further, it is also respectfully that the combination of Matsumoto et al. in view of Van Aken et al. neither expressly nor impliedly suggests "the reference used for the image locations in a particular group of the pixel map being constructed from at least one reference to the color look-up table which defines the color value in the source image for at least one image location in the particular group".

In addressing this feature in the above rejection, column 6, lines 9-12, of Van Aken et al. is being relied on. However, in this portion, van Aken et al. only discloses in accordance with the particular received pixel color code, addressor selects 1 of 16

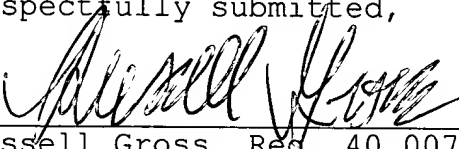
color data registers of the color look up table 230 and output the data stored therein.

Based on the above disclosure, it is evident that Van Aken et al. does not disclose "at least one reference to the color look-up table which defines the color value in the source image for at least one image location in the particular groups", as required by the claims. Therefore, it is also respectfully submitted that this feature is also distinguishable over Matsumoto et al. in view of Van Aken et al.

In view of the above-described distinctions, the Appellant respectfully submits that the invention of Claims 1-12 is not Matsumoto et al. Therefore, it is respectfully requested that the rejection of these claims be reconsidered and reversed.

The Commissioner is hereby authorized to credit any overpayment or charge any fee (except the issue fee) to Account No. 14-1270.

Respectfully submitted,

By   
Russell Gross, Reg. 40,007  
Attorney  
(914) 333-9631

**CERTIFICATE OF MAILING**

I hereby certify that this correspondence is being deposited this date with the United States Postal Service as first-class mail in an envelope addressed to:

**COMMISSIONER OF PATENTS AND TRADEMARKS**

**Washington, D.C. 20231**

On September 7, 2001  
By Edna Chapa